

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

**COMMSCOPE HOLDING COMPANY, INC.,
COMMSCOPE INC., ARRIS US HOLDINGS,
INC., ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC**

Defendants.

CIV. A. NO. 2:21-CV-310-JRG

**JOINT MOTION TO AMEND STANDING ORDER ON THE NUMBER AND USE OF
PRE-ADMITTED EXHIBITS AT TRIAL**

Pursuant to the Court's Standing Order on the Number and Use of Pre-Admitted Exhibits in Cases Assigned to Chief Judge Rodney Gilstrap Involving Allegations of Patent Infringement and/or Breach of FRAND Obligations, As Well As Declaratory Judgment Actions Which Relate to the Same (the "Standing Order"), the parties were allotted 75 exhibits for inclusion on a Joint Exhibit List, and 30 additional exhibits per side for inclusion on their respective Party Exhibit Lists, for a total of 135 exhibits for the upcoming trial. The parties have met and conferred in good faith and reached agreement on the allotted 75 joint exhibits. The parties have also sought in good faith to narrow the individual parties' exhibits to the allotted 30 additional exhibits per side. After a thorough review of the parties' individual lists, TQ Delta and CommScope jointly move for an additional 15 exhibits per side. This amendment would result in a total of 45 additional exhibits per side (rather than 30), and 165 exhibits in total (rather than 135).

As set out in the Standing Order, the goals of the exhibit limitations are to prevent overburdening the Court and parties and to provide for a more realistic and efficient means of resolving disputes regarding exhibits. Standing Order at 1. The parties believe that the proposed amendment is narrowly tailored and will continue to serve those goals. The amendment will also help to ensure the inclusion of the parties' key documentary evidence in this case and allow the parties to present their cases in a concise and orderly fashion. Accordingly, the parties jointly and respectfully request that the Court amend the Standing Order as set forth herein. A proposed order granting this request is being submitted herewith.

Dated this 21st day of February, 2023

Respectfully submitted,

By: /s/ Rudolph Fink

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ATTORNEYS FOR THE
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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, February 21, 2023, I electronically filed the foregoing JOINT MOTION TO AMEND STANDING ORDER ON THE NUMBER AND USE OF PRE-ADMITTED EXHIBITS AT TRIAL with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing upon Counsel of Record, and served a true and correct copy of the above and foregoing document to all counsel of record via electronic mail.

/s/ Rudolph Fink
Rudolph Fink

CERTIFICATE OF CONFERENCE

I hereby certify that on Tuesday, February 21, 2023, counsel for both parties have met and conferred to discuss trial exhibits at length and are jointly filing this motion to amend the Court's Standing Order to expand the number of exhibits for trial.

/s/ Rudolph Fink
Rudolph Fink